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CANON INFORMATION TECHNOLOGY SERVICES, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

STEPHANIE NICOLE GONZALEZ-
COLON, as an individual,

Plaintiff,

v.

FRASCO, INC. d/b/a
FRASCOFILES, CANON
INFORMATION TECHNOLOGY
SERVICES, INC, and DOES 1-10
inclusive,

Defendants.

CASE NO. 2:25-CV-04414

Hon. Maame Ewusi-Mensah Frimpong
Courtroom 8B

[Los Angeles Superior Court Case No.
25NNCV02482]

**DECLARATION OF PAVLINA K.
RAFTER IN SUPPORT OF
DEFENDANT CANON
INFORMATION TECHNOLOGY
SERVICES, INC.'S MOTION TO
DISMISS PLAINTIFF'S
COMPLAINT**

[Filed concurrently with Notice of Motion
and Motion; Memorandum of Points and
Authorities; Declaration of Brian Griggs,
and [Proposed] Order]

DATE: August 14, 2025
TIME: 10:00 A.M.
PLACE: United States Courthouse
350 West First Street
Los Angeles, CA 90012
Courtroom 8b, 8th Floor

Complaint Filed: April 10, 2025
Trial Date: Not Set

DECLARATION OF PAVLINA K. RAFTER

I, Pavlina K. Rafter, declare:

1. I am a Senior Attorney with the law firm of Dorsey & Whitney LLP, counsel of record for Defendant Canon Information Technology Services, Inc. (“Defendant” or “CITS”) in this action. I submit this declaration in support of Defendant’s Motion to Dismiss Plaintiff’s Complaint. I have personal knowledge of the following facts, except as to those which are based upon information and belief, and could competently testify thereto if called upon to do so.

2. I met and conferred with Plaintiff’s counsel, Devin Fok, regarding dismissal of the claims against CITS by telephone on May 5, 2025 and May 9, 2025. I further met and conferred with Mr. Fok regarding this Motion by telephone on May 22, 2025, and I followed up with an email on May 23, 2025. We were unable to resolve the jurisdictional issue raised in this Motion.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct. Executed this 4 day of June 2025, at Redondo Beach, California.


Pavlina K. Rafter

CERTIFICATE OF SERVICE

All Case Participants are registered for the USDC CM/ECF System

***Stephanie Nicole Gonzalez-Colon v. Frasco, Inc. D/B/A Frascoprofiles,
Canon Information Technology Services, Inc
United States District Court
Central District of California – Western Division
Case No.: 2:25-CV-04414***

**DECLARATION OF PAVLINA K. RAFTER IN SUPPORT OF
DEFENDANT CANON INFORMATION TECHNOLOGY SERVICES,
INC.'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

I hereby certify on June 4, 2025, I electronically filed the foregoing with the Clerk of the Court for the United States District Court, Central District of California by using the CM/ECF System.

Participants in the case who are registered CM/ECF Users will be served by the CM/ECF System.

DATED: June 4, 2025

DORSEY & WHITNEY LLP

By: /s/Pavlina K. Rafter
Pavlina K. Rafter